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8 Attorneys for Defendants,
9 City of El Segundo (also erroneously sued herein as
10 “El Segundo Police Department”), Chief Mitch Tavera,
11 Lt. Ray Garcia, Sgt. Janet Garza, Officer Erik Atkinson,
12 and Officer Jeffrey Humphrey

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 JEFFREY SIMONEK,

16 Plaintiff,

17 vs.

18 CITY OF EL SEGUNDO; EL
19 SEGUNDO POLICE DEPARTMENT;
20 MITCH TAVERA, Chief of Police of
21 the El Segundo Police Department;
22 ERIC ATKINSON; JANET GARZA;
23 RAY GARCIA; JEFFREY
24 HUMPHREY; GREG BURNER;
25 KELLY BURNER; EL SEGUNDO
26 SCHOOL DISTRICT, and DOES 1
27 through 10, inclusive,

28 Defendants.

Case No.: CV15-9190 JAK (ASx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT
FOR DAMAGES**

Discovery Cut-Off: Not set
Final Pre-Trial Conf.: Not set
Trial: Not set

IT IS HEREBY STIPULATED by and among the parties to this action,
through their counsel of record, as follows:

1. On November 25, 2015, the plaintiff filed the Complaint in this
action.

2. Defendant Chief Mitch Tavera was served with the Complaint on
February 11, 2016. The other City of El Segundo defendant officers (Lt. Ray
Garcia, Sgt. Janet Garza, Officer Erik Atkinson and Officer Jeffrey Humphrey)

**STIPULATION TO EXTEND TIME TO RESPOND
TO SECOND AMENDED COMPLAINT**

1 were served in the days thereafter. Pursuant to Federal Rules of Civil Procedure,
2 Rule 15(a)(3) and 5(a)(1)(C), Chief Tavera's deadline to file a responsive pleading
3 is Thursday, March 3, 2016.

4 3. On February 25, 2016, counsel for the City of El Segundo defendants
5 sent a letter to plaintiff's counsel advising of their intent to file a Motion to
6 Dismiss and outlining the bases for that motion, as required by Central District
7 Local Rule 7-3.

8 4. On February 26, 2016, plaintiff's counsel responded to the meet and
9 confer letter and advised that the plaintiff would be filing an amended complaint.
10 On March 1, 2016, plaintiff's counsel advised that an amended complaint would
11 be filed on March 7, 2016.

12 5. To avoid needless law and motion, the parties hereby stipulate,
13 subject to the approval of the court, to extend the deadline for the City of El
14 Segundo defendants to respond to the Complaint from March 3, 2016, to March
15 21, 2016. If the plaintiff files an amended complaint, these defendants' deadline to
16 respond to that complaint shall be 21 days from the date the amended complaint is
17 filed.

18 IT IS SO STIPULATED.

19
20 DATED: March 2, 2016

LAW OFFICE OF STEFFENY HOLTZ

21 /s/ Steffeny Holtz

22 By: _____

23 Steffeny Holtz, Esq.
24 Attorneys for Plaintiff

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1 DATED: March 2, 2016

CARPENTER, ROTHANS & DUMONT

2 /s/ *Jill Williams*

3 By: _____

4 Steven J. Rothans, Esq.

5 Jill Williams, Esq.

6 Attorneys for Defendants,

7 City of El Segundo, Chief Mitch Tavera, Lt.

8 Ray Garcia, Sgt. Janet Garza, Officer Erik

9 Atkinson and Officer Jeffrey Humphrey